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*Attorneys for The Leaders Group, Inc.*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

GALLINA FAMILY BANK IRREVOCABLE TRUST, a Nevada Trust; JOHN GALLINA, an individual; and RICHARD F. GALLINA, as trustee of the GALLINA FAMILY BANK IRREVOCABLE TRUST,

Plaintiffs,

vs.

THE LINCOLN NATIONAL LIFE INSURANCE COMPANY, a foreign Company; NORMAN KASTNER, an Individual; THE LEADERS GROUP, INC., a foreign company; WS GRIFFITH SECURITIES, INC., a foreign company; CAPITAS FINANCIAL, INC., d/b/a THE BLAIR AGENCY, a foreign company; ROE CORPORATIONS 3-10, inclusive; and DOES 1-10 inclusive,

Defendants.

Case No.: 2:21-cv-00090-JCM-DJA

**DEFENDANT THE LEADERS GROUP, INC.'S UNOPPOSED MOTION TO EXTEND DEADLINE TO FILE RESPONSIVE PLEADING**

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and LR IA 6-1, defendant The Leaders Group, Inc. (**Leaders**) respectfully requests the Court extend the deadline to answer or otherwise plead to plaintiffs' second amended complaint, until February 11, 2021. In support of its motion, Leaders states as follows:

...

...

1 1. Plaintiffs' second amended complaint was filed on November 24, 2020 in Clark County  
2 District Court [ECF No. 1-6].

3 2. Leaders was served on December 16, 2020 via process server.

4 3. Counsel for Leaders previously conferred with counsel for plaintiffs and requested an  
5 extension of time to respond to plaintiffs' second amended complaint up to and including February  
6 11, 2021. Plaintiffs' counsel agreed to the requested extension of time.

7 4. Leaders now respectfully requests the Court extend its deadline to respond to the second  
8 amended complaint through and including February 11, 2021.

9 5. Leaders is requesting this extension of time to allow its counsel adequate time to collect  
10 and review documents and information relevant to the purchase and sale of the insurance policy at  
11 issue in this case, which occurred nearly twenty years ago in 2001 [ECF 1-6 at ¶ 6], and to assess  
12 whether Nevada courts have personal jurisdiction over defendants.

13 6. This is Leaders' first request for an extension; this request is brought in good faith and is  
14 not made to unnecessarily delay discovery or the proceedings in this matter.

15 7. No party will be prejudiced by the requested extension nor, respectfully, will the  
16 extension unduly burden the Court.

17 8. Counsel for Leaders sought concurrence to this motion from counsel for plaintiffs.  
18 Plaintiffs' counsel indicated that plaintiffs do not oppose this request to extend the responsive  
19 pleading deadline to February 11, 2021.

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1 Leaders respectfully requests the Court grant its unopposed motion to extend deadline to file  
2 responsive pleading, extending the deadline to answer or otherwise plead to plaintiffs' second  
3 amended complaint through and until **February 11, 2021**.

4 DATED February 1, 2021.

5 **AKERMAN LLP**

6 /s/ Scott R. Lachman

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13 *Attorneys for The Leaders Group, Inc.*

14 **IT IS SO ORDERED.**

15 

16 United States Magistrate Judge

17 Dated: February 2, 2021

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